

Exhibit N

Estate of Mitchell David Laks

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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JOANNE T. ALCABES, et al,

AFFIDAVIT OF
GAIL BARBARA LAKS

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)

: SS.:

COUNTY OF PALM BEACH)

GAIL BARBARA LAKS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 70 Burgundy B, Delray Beach, Florida 33484.
2. I am currently 75 years old, having been born on January 22, 1947.
3. I am the sister of Mitchell David Laks, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.
4. Mitchell passed away from esophageal cancer on October 20, 2016. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On March 7, 2017, I was issued Letters of Administration on behalf of my brother's estate from the Circuit Court, Palm Beach County, Florida.

6. Mitchell was a great brother to me. We only lived about a mile apart from each other at one point and would see each other on weekends since we both worked. Our entire family would get together every Friday night to share a dinner and that became our family tradition. We would also all go on vacation with each other and our kids during their school breaks. Disney World and beach resorts were our favorite places to travel. We became closer to each other through these experiences.

7. My brother worked for the Metropolitan Transportation Authority (MTA). Following the attacks on September 11th, he and some of his colleagues were responsible for going to the Brooklyn–Battery Tunnel and removing the cars that were stranded there. After that, he worked at Ground Zero as part of the clean-up effort.

8. In or about 2008, Mitchell began to not feel well. He went to his primary doctor, who voiced some concerns after seeing the results of Mitchell’s blood work. He urged him to have a colonoscopy exam. This exam led to Mitchell’s first cancer diagnosis – colon cancer. He underwent surgery and then began a course of chemotherapy treatments. He had a difficult time with these treatments, but he got through them. We thought he was getting better but, unfortunately, he continued to develop other cancers. I remember that by the end, he had been diagnosed with five or six cancers, including colon, prostate, esophageal, bladder, and kidney. It was awful.

9. Mitchell was constantly in pain because of the cancers and having to undergo operation after operation. His illness forced him to retire earlier than he otherwise would have. He had moved to Florida just ahead of his second cancer diagnosis, which was his prostate cancer. Mitchell had always planned on moving to Florida to enjoy his retirement. Unfortunately, his cancer diagnoses and illnesses kept that from coming to fruition. He also wanted to travel in

retirement but was prevented from doing so because of his dialysis treatments. He tried to enjoy what he could, but his illness made it impossible to be active as he had wanted and enjoy his retirement as he had intended.

10. With Mitchell living in Florida and me living in New Jersey, it became a challenge for me and other family members to see and support him during his illness. I was only able to travel to see him over a weekend every few months. He would call and tell me that he was not feeling well, but I and the others were not able to be there with him because of the distance.

11. After moving to Florida, Mitchell's marriage broke up. He moved into my condo for several months until he was able to purchase one of his own. I had purchased a condo in Florida near where he was living since it was always our intention to live near each other so we can spend quality time together in our retirement. Sadly, we were only able to enjoy this close proximity a few times since Mitchell passed away soon after I got there.

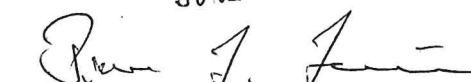
12. Mitchell also lost the opportunity to enjoy his retirement with other members of his family, like his two sons. He was not able to talk with them or share advice as he otherwise would have, and they lost the same opportunities with him. Mitchell also has a granddaughter who was young at the time of his illness and passing. She is soon to be 13 years old, and he lost the opportunity to see her grow up to be a lovely young lady.

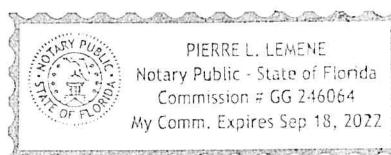
13. Mitchell was afraid of dying and fought tooth and nail to recover so he could live out his life enjoying himself, but it wasn't meant to be. He suffered so much over the course of his illnesses, one on top of the other. My heart broke every time I thought of what he must be feeling. I only saw his pain from the outside, but it was clear that the pain he was feeling on the inside was taking its toll. He was so weak and frail at the end of his life. It was somewhat of a

blessing that he was finally pain free and at peace. Mitchell was a great brother, father, friend and soul. His passing was a great loss to all of us.


GAIL BARBARA LAKS

Sworn to before me this
15th day of ~~May~~^{JUNE}, 2022


Notary Public



Estate of John Paul LaPointe

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al

AFFIDAVIT OF
STAN R. LAPOINTE

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF MAINE)

: SS.:

COUNTY OF KENNEBEC)

STAN R. LAPOINTE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 682 China Road, Winslow, Maine 04901.

2. I am currently 68 years old, having been born on May 23, 1954.

3. I am the brother of John Paul LaPointe, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.

4. John passed away from liver cancer on August 8, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On August 16, 2016, I was duly appointed personal representative of my brother's estate by the Maine Probate Court for the County of Kennebec.

6. John was my big brother. He was four years older and very protective of me. I idolized him and tried to emulate everything he did. We enjoyed being together and going camping, fishing and hunting. We also followed similar career paths. After John started teaching,

I taught for a year as well. Realizing that teaching wasn't really lucrative, we both became ironworkers. We traveled all over the country putting up buildings. John had two passions – football and being an ironworker. I lived with my brother for years while we were working in construction.

7. My brother was very passionate about his country. John was living in Detroit on 9/11. The minute he heard about the terrorist attacks, he packed up his bags, jumped in his car, left the job he was working on, and headed to New York. He was one of the first 300 people to show up to respond, and he never went back to Detroit full time until it was all done.

8. After 9/11, my brother showed up at the World Trade Center and declared that he was there to help in any way he could. No one ever issued a warning saying you might get sick. My brother became part of the larger crew helping to clean up the carnage. Based on some details John shared with me, it was evident that anyone working on that pile was quite distressed from their work. In the process of clearing debris, John saw human remains and dismembered bodies. This wreaked havoc on his psyche, but he continued the work there because he was a true patriot. Around November 2001, I was coaching the Winslow High school football team. In the middle of a championship game, John showed up to visit. When I saw him on the sidelines, I could tell that he didn't look the same. There was a profound sadness in his eyes. This was foreign to me because he was always a jovial guy.

9. John was always a fit guy, weighing about 230 lbs. of sheer rock. In about 2005, I noticed John was losing weight. He must have been ill for some time. When our father was in hospice, John would come and listen and speak with the hospice nurse. Later, he stopped doing that. At first, I thought he was just tired. However, on the day before our father died, I knew it was much more than that. John pulled me aside and asked if I would handle everything regarding our father's estate. I had thought that because he was the oldest, he would step up and take care of everything. He said that he just couldn't do it. Looking back, there is no doubt in my mind that John felt too overwhelmed with his own health issues to manage our father's affairs.

10. I became somewhat more involved in my brother's care after he had difficulty refilling an out-of-state prescription. Unable to find appropriate care in the countryside, I took

John to the Lahey Medical Center near Boston. Within fifteen minutes, the doctor came out and informed me that John would need to remain in the hospital. The doctor quickly inquired as to whether John was at 9/11, noting he had seen many similar cases in the 9/11 community. Sadly, the doctor advised me that there were no treatments available to John because his cancer was too advanced.

11. I could see John was experiencing so much pain and discomfort. There were times where John confided in me that the pain was so great, he felt that he couldn't bear to live another day. To help ease the pain, John tried natural remedies wherever possible. At the suggestion of some friends, he tried Rick Simpson oils and cannabis, which could be turned into a paste and eaten on a cracker. There were times he wouldn't even move for ten hours, which was good. John appeared to be responding to some of the alternative treatments. The cannabis afforded him some relief from the pain, but it was always just a short, temporary fix. In addition to the pain that he felt during the day, John had trouble sleeping, sometimes because of the cancer, other times due to nightmares from 9/11. He would take some cannabis to help him sleep. John was angry and frustrated, knowing that he was such a strong man but was now so weak he was unable to lead the lifestyle to which he had become accustomed.

12. In addition to the physical distress John endured, he also suffered emotional trauma as a result of his cancer. He became increasingly concerned about my mother, frequently bringing up how he wanted to make sure she would be taken care of after he was gone. There was also little doubt that John had become anxious and panicky, insisting that I needed to be around nearly every moment toward the end of his life. Sadly, toward the end of his life, I wasn't able to be there for him for a couple of weeks. John was very sensitive about my temporary absence.

13. Ultimately, toward the end of his life, John recognized that his capabilities were not the same as they once were. He was confused about where he needed to be. Returning home to Winslow, Maine was probably the biggest indicator that he was accepting his new limitations. After John passed away, I found a letter in his safety deposit box stating that everything he had left over should go to our mother. Clearly, as a result of the preparations John made, as well as the manner in which he made them, my brother was aware that he did not have

long to live. While he endured enormous physical pain, he had accepted this reality for quite some time.

14. I am certain that, had my brother been informed about all of the risks of working in the World Trade Center area, he would do it all over again. Upon digging through remnants of the twin towers, the ironworkers found a piece that formed a cross and looked to it as a symbol of hope. Like many others, my brother wrote his name, and my parents' names, in order to help preserve his contribution to the relief effort. The cross is exhibited at the National 9/11 Memorial Museum. It comforts me to know that John will never be forgotten.


STAN R. LAPOINTE

Sworn to before me this
13th day of June, 2022


Notary Public

Bailey E. Levesque
Notary Public, Maine
My Commission Expires December 2, 2027

Estate of Michael John Loughery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
MARY ELIZABETH
LOUGHERY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

MARY ELIZABETH LOUGHERY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 12 Crooked Stick Road, Jackson, New Jersey 08527.

2. I am currently 80 years old, having been born on October 18, 1941.

3. I am the wife of Michael John Loughery, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my claim on behalf of my husband's estate.

4. On October 23, 2017, my husband Michael died from prostate cancer. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 27, 2017, I was issued Letters of Administration for my husband's estate by the State of New Jersey, Ocean County Surrogate's Court.

6. My husband and I were married for 54 years, and had moved from Staten Island to an adult golf community in New Jersey. We traveled together, had a great group of friends, and were very social. Michael was my best friend and together we enjoy many things, including

trips into the City to see plays, as well as celebrations and family gatherings, which were so essential to him.

7. Michael was already retired from the NYPD on September 11, 2001, but they reactivated all of the retirees. He was placed on a bus and went right down to Ground Zero. After spending a number of days at Ground Zero, Michael was assigned to work at Miller Field, where he would sift through debris from the World Trade Center, looking for any indication of human remains. Prior to retiring from the police force, Michael was working for a security company that had a number of clients, including Deutsche Bank and others, in the area of Ground Zero. After the dust had settled a bit, one of his responsibilities was to go around and confiscate the computers that remained in buildings damaged around the site, requiring him to return to Ground Zero for quite a while.

8. In 2007, Michael went for a regular physical and his PSA numbers were very high. He was diagnosed with prostate cancer. Up until that time, he was a healthy man. My husband continued to see a doctor at Columbia Presbyterian who performed a radical prostatectomy. This required multiple trips into the City as his cancer progressed so that the doctor could monitor and treat Michael's illness. He was fine for a few years until the cancer reared its ugly head again.

9. Michael went through a lot of physical pain. The cancer had metastasized to his spine, and his lower lumbar region was affected. This caused him considerable pain while walking. First, we needed to give him a cane and later a rollator and wheelchair. He was also on a lot of medication. We worked to monitor Michael's condition as best we could, but it wasn't easy.

10. Michael had such a strong personality and he never felt sorry for himself. In fact, rather selflessly, Michael felt worse for the younger guys who were certain to come down with terrible illnesses from the toxic air following the attack. My husband was a stalwart who kept on fighting.

11. Michael loved his children and grandchildren and wanted whatever was best for them. As a result, despite everything he was going through, he didn't want his family to see him suffer and always put on a brave face.

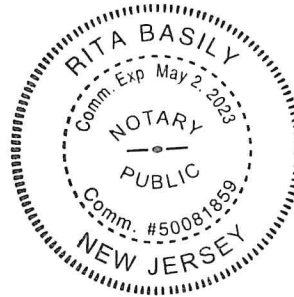
12. There is an emptiness and a loss that I will never get over. More critically, I feel bad that he was never able to see all the accomplishments of his eight beautiful grandchildren; he

had a great rapport with them, and they all adored him. That's what we miss the most.


MARY ELIZABETH LOUGHERY

Sworn to before me this
6 day of April, 2022


Notary Public



Estate of Daniel Marcucci

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
MARK MARCUCCI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

MARK MARCUCCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 560 Hunt Lane, Manhasset, New York 11030.

2. I am currently 59 years old, having been born on October 19, 1962.

3. I am the son of Daniel Marcucci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. On October 7, 2017, my father died from pancreatic cancer. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On January 9, 2018, I was granted Letters Testamentary of my father's estate by the Surrogate's Court of the State of New York, County of Queens.

6. My father was a wonderful parent to me as well as my younger brother and sister. Growing up, our dad took an interest in all of our activities, never missing any of my little league games, my brother's band concerts, or my sister's dance recitals. My dad always tried to bring the family together for events and holidays and was very focused on the family. After I

had my own children, my dad became very involved in their life and was proud to be a grandfather, never failing to attend their school events, including concerts and sporting events. He was an avid photographer and became the de-facto photographer for his grandchildren's little league teams. Ultimately, my father wanted what was best for his family and worked to fulfill their dreams as best that he could.

7. My father worked as an inspector for New York City's Department of Buildings (DOB). A few weeks after the September 11th attacks, my dad was activated to work on the facade team, inspecting damage to buildings in the vicinity of the World Trade Center. He continued in this role up through November, 2003. After that work concluded, my dad continued to work for the DOB in lower Manhattan for the next ten years.

8. Following my dad's 9/11 exposure, I first noticed him becoming ill in about 2004. He started complaining about sinus issues. Years later, in 2009, my dad was diagnosed with prostate cancer. During this time, he suffered from gastroesophageal reflux disease (GERD) as well as upper respiratory ailments. Our worst fears were realized in 2015, when my dad was diagnosed with pancreatic cancer. As a result of the prostate cancer, my dad's PSA levels were monitored. In 2015, they escalated to the 7s and 9s, which led to a recommendation for a further CAT scan. In early summer of 2015, a biopsy was done at St. Francis Hospital that identified the malignancy of growths in his abdomen. Sadly, while the doctors had scheduled my dad for surgery, a subsequent CAT scan revealed that the pancreatic cancer had spread to his liver and the surgery was canceled. Shortly afterward, my dad began chemotherapy in July, 2015. It should be noted that we don't have a history of cancer in our family and my dad's BRCA gene test was negative. This, combined with my knowledge of his work in the exposure zone, makes me certain my dad's cancer was caused by the 9/11 attacks.

9. After receiving the pancreatic cancer diagnosis, he was extremely disheartened to learn that cancer had spread to his liver and the surgery would need to be canceled. I can see my dad suffering and become especially worried concerning the well-being of his family. Over the course of his chemotherapy, my dad not only had lower energy but also appeared gaunt and complained of frequent backaches. My dad desperately wanted to restore his health to take care of my mom.

10. In 2015 after the chemotherapy began, my dad was able to keep the tumor in check. Unfortunately, I believe that my father, and the rest of us, understood that chemo would only be a temporary fix. This created extraordinary stress on my dad, who already needed to take care of my mom with her two bad knees and a bad ankle since he was her primary caregiver. My mom was no longer driving and he acted as her arms and legs and wanted to provide support to her as long as possible. While my dad worked with talented oncologists, the combination of cancer drugs had painful side effects, including a bad neuropathy, which created a weakness in his extremities. By mid-2017, the doctor recommended immunotherapy and clinical trial as a different option. My dad was accepted into one of the clinical trials and was excited at the prospect of prolonging his life. However, after only one or two rounds, he suffered more severe side effects and by early September his liver started to fail.

11. My dad's diagnosis was so heartbreaking and it was painful to watch the debilitating effects of his condition. My father was a robust, strong, and incredibly active person. Despite being in a heavily physical vocation his entire life, as far as I know, he never took a sick day. To see how my dad's 9/11 exposure took over and consumed his body and ultimately killed him was gut-wrenching for all of us. Even though my dad suffered from cancer over the course of many years, there's no question that the 9/11-related toxins that he inhaled each day were responsible for his cancers and respiratory ailments. Our family suffered and is still grieving, but it was my father who had to undergo such difficult treatments, creating an agonizing experience.



MARK MARCUCCI

Sworn to before me this
20 day of April, 2022


Notary Public

WOOCHUL KIM
Notary Public, State of New York
No. 01K16232939
Qualified in Nassau County
Commission Expires Dec 20, 20 22

Estate of Timothy Charles Marion

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
KRIS MARION

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

KRIS MARION, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1 Seward Street, North Babylon, New York 11704.

2. I am currently 63 years old, having been born on August 12, 1958.

3. I am the wife of Timothy Charles Marion, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. Timothy passed away from tongue cancer on July 20, 2015, at the age of 58. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On September 16, 2015, I was issued Letters Testamentary on behalf of my husband's estate by the Suffolk County, New York Surrogate's Court.

6. My husband and I met in 1974. We hit it off right away and continued to build a great relationship throughout our courtship and marriage. We loved going for long walks on the beach and enjoyed getting together with family on holidays. Timothy was a good husband and father to our daughter, especially after her divorce. Our granddaughter was the light of his life.

7. On 9/11, Timothy worked for the Department of Transportation. Upon learning of the attacks, he went into the city to help clean up the debris and transport it to a landfill in New Jersey. He did this a few times a week for a couple of weeks.

8. In or about May of 2014, my husband began complaining about pain in his mouth that was causing him to have trouble eating. He noticed there was a sore on his tongue. Timothy always was very good at yearly checkups and looking after his health, especially after 9/11. For some reason, he was reluctant to go to the doctor this time. It was almost as if he knew that something was wrong. My daughter convinced him to have his mouth looked at by an Ear, Nose and Throat specialist. After a biopsy was performed, it was discovered that Timothy had tongue cancer. The diagnosis shocked us all. After the diagnosis, Timothy underwent a surgical procedure wherein they removed half of his tongue. His tongue was reconstructed using muscle from his leg. This was followed by radiation and chemotherapy treatments. All of this took its toll on Timothy.

9. The diagnosis and treatment had a huge impact on Timothy. He continued to decline and became increasingly depressed and lethargic. He lost a lot of weight because it was difficult for him to eat. He eventually required a feeding tube, which would sometimes clog and need to be changed. Our daughter was getting married in November of 2014. Timothy was very close to our daughter, and there was no way that he was going to miss her wedding. He fought as hard as he could to be able to walk her down the aisle. It was difficult for him to talk, and he was having trouble walking. He finished his radiation therapy before the wedding. It wasn't the way any of us had planned, but he was there at her wedding. The chemotherapy was extremely rough on him.

10. Before he was diagnosed, Timothy spent a lot of time with our granddaughter and daughter. If our daughter needed help with something, he could fix it. One of Timothy's favorite things was caring for our lawn. We didn't have a big piece of property, but it was important to him that it always looked good. Every weekend, he would be outside, mowing the lawn. He took pride in it. Timothy knew that our daughter, granddaughter, and I depended on him. He was "the man of the house" for all three of us. We all often turned to him for help, and he never let any of us down. Whatever we needed, whether it was a pep talk or advice to our daughter or going on walks with his granddaughter, he did it all. He wasn't able to work, but he had a full

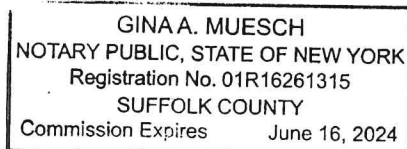
life. He was still very much needed.

11. By January 2015, the cancer had spread to his back and bones. Eventually, he couldn't eat. I had to spoon-feed him liquified food through a feeding tube. Because he couldn't speak, we started communicating by passing written notes back and forth. He had a tracheostomy tube. He couldn't play with his granddaughter. Everything he loved to do, he couldn't do anymore. Add to that having to be fed, moved, and assisted to do even basic functions. It was difficult for him to accept. He was scared and frustrated and unable to communicate. He experienced a complete role reversal. He went from taking care of all of us to being utterly dependent on me and my daughter to do everything for him. We even had to pay someone else to mow the lawn. His quality of life was gone, and he didn't have to say it. He was constantly in pain. He would get out of bed, walk to the couch, and stay there all day. He would fall asleep there. It was like he was a prisoner in his own home and body. He suffered like that for 14 months until he died.


KRIS MARION

Sworn to before me this
15th day of May, 2022


Notary Public



Estate of Joseph James Martin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
BARBARA GERAGHTY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

BARBARA GERAGHTY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 100 Colfax Avenue, Apartment 4K, Staten Island, New York 10306.
2. I am currently 74 years old, having been born on September 16, 1947.
3. I am the sister of Joseph James Martin, upon whose 9/11-related respiratory injuries my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.
4. My brother passed away from complications related to respiratory illness on June 5, 2016, at the age of 51. It was medically determined that his respiratory illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On July 20, 2016, I was issued Letters of Limited Administration on behalf of my brother's estate from the New York Surrogate's Court, Richmond County.

6. Joseph and I were very close growing up. There were three of us from one father – Hugh, Edmund and me. Joseph shared the same mom as we had. Joseph’s father died when he was very young. All the kids were raised by my mother. Hugh, Edmund and I were much older than Joseph. I was sixteen when he was born. Between the four siblings, Joseph was the glue that kept us all together. He was the one who made sure we all spent holidays together. If there were any disagreements between family members, Joseph would be the peacekeeper. We might have looked on him as more of a son, but he never acted like he was our child. He never took advantage of that and never held his hand out looking for anything. He was the first one to offer help. He was the one who took care of me when I was sick.

7. Joseph was closest with me and my brother, Edmund. When Edmund moved to Massachusetts, Joseph would take the bus to visit him. I’ve had health problems of my own for many years. Joseph lived nearby and would check up on me all the time. He’d be at my house at least once a week. I could count on his help for anything I needed. I remember there was a power outage, and I didn’t have any electricity for six days. I live on the fourth floor of an apartment building, so the elevators weren’t running. The power company was giving away bags of ice to help us keep food fresh. They had specific pick-up locations. Joseph went every day and waited on line to get the bags of ice. He’d then haul them up four flights of stairs for me. That’s the kind of person he was, just a wonderful guy.

8. When it came to helping others, Joseph was as generous as could be, especially with me and the family. You could ask him for the shirt off his back, and he would give it to you. However, it was the exact opposite for him. He never asked anything for himself. He was always like that—very private and quiet, almost secretive about sharing his personal life with us. Because I spent the most time with him, I was able to observe him. If I saw anything that

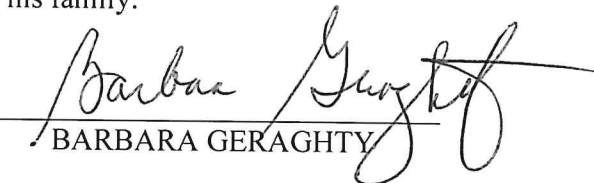
concerned me, I would question him about it. I worried about him like a mother would about her son. Joseph's answer was always the same, "I'm fine. There's nothing wrong. Don't worry." He was that way with our brother, Edmund, too. More often than not, I'd be the one to tell Edmund if something had happened. When Joseph was diagnosed with asthma and was having respiratory problems, I believe I was the one who told Edmund.

9. Joseph was a police officer in the 1st precinct, and the World Trade Center was part of his regular command. He usually worked the midnight to 8:00 a.m. shift. On 9/11, he was down there, as he had just completed his shift. He was assigned to the mortuary and spent months there looking for human remains amid the rubble. He would work for days at a time. It was awful for him. Everything in the area was covered with dust and debris, and Joseph was in the pile, digging through all of it. He didn't talk much about it, not even with me, and I was a fellow police officer. I don't know if he confided in anyone about what he went through during those months at Ground Zero. I'm sure it affected him both emotionally and mentally, but he never talked about it. I hope there was someone he was able to confide in, so he didn't have to keep all of that horror and misery inside.

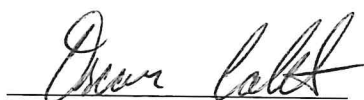
10. For several years before Joseph died, I noticed changes in him. He would sweat profusely, his breathing sounded labored, and he would often fall asleep during the day. I knew he had been diagnosed with asthma, and I believe that was caused by his work down at Ground Zero. I was concerned. I begged him to tell me if there was something else besides the asthma. Joseph would tell me that everything was fine. But I think he knew something was wrong for quite some time. The Thanksgiving before he died, Joseph convinced me to take the bus to Massachusetts with him and spend the holiday at Edmund's house. That's not something I would normally do, but he really wanted everyone to be together. I got the feeling that was

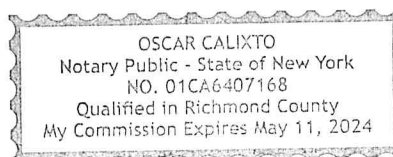
intentional—to have us all get together—in case it was the last time. He clearly wasn't well. I could see that just by looking at him. He had gained weight, He had trouble sleeping at night, which I believe was due to his breathing problems. He sometimes slept in a chair because he couldn't breathe lying down. He would fall asleep in the middle of the day. But, if you asked him how he was, even if you asked him directly about his health, he wouldn't acknowledge anything was wrong.

11. Joseph was on vacation overseas in the Philippines when he died. It was devastating. He went away to have a nice vacation, and he never came home. Before he left for the airport, we hugged and kissed goodbye. I wished him a safe flight and told him to call me whenever he could. I got a couple of calls from him. The third and last phone call I got from him, he sounded very weird. I could barely hear him. I didn't understand what he was saying. I thought it was just a bad phone connection. The call ended, and he didn't call me back, which wasn't like him. I didn't know what had happened. On that last phone call with him, he didn't tell me that he was in the hospital, but I now suspect that he was. He sounded different, very weak. Finally, I got a call from a doctor in the Philippines, who told me that Joseph was in bad shape. I could barely hear anything, but I understood that it was bad. Then we got the news that he had died. I was shocked and hoped he wasn't in pain at the end. I hope he wasn't alone. It breaks my heart that he died in a foreign country away from his family.


BARBARA GERAGHTY

Sworn to before me this
29th day of June, 2022


Notary Public



Estate of Gary Gerald Mausberg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF MARGARET
MAUSBERG-BOUTON**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF ST. JOHNS)

MARGARET MAUSBERG-BOUTON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 428 Maribella Court, St. Augustine, Florida, 32086.

2. I am currently 56 years old, having been born on September 6, 1965.

3. I am the wife of Gary Gerald Mausberg, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my claim on behalf of my husband's estate.

4. On October 8, 2008, my husband passed away from kidney cancer at age 47. It was medically determined that this illness was causally connected to this exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On February 11, 2015, I was appointed personal representative of my husband's estate by the Surrogate's Court of the State of New York, Nassau County.

6. Gary was a loving husband and we did everything together. We had so many things in common that we considered ourselves one person. Ultimately, I would say that we had a perfect relationship. In addition to traveling to Jamaica for vacation or to Pennsylvania to visit with Gary's parents, we enjoyed bowling and hosting barbecues for family and friends. I was so

proud of Gary and his service to the NYPD. In fact, I always felt that we were fated to be together, especially since his shield number (19659) contained the month and year I was born (9/6/1965).

7. On September 11, 2001, Gary worked as a police officer with the NYPD and had been assigned to provide security to the World Trade Center site after the terrorist attack. He had started to work security there just a few days after the attack and continued work in the immediate vicinity of the fallen towers in the following months. Upon returning from work, Gary relayed to me the chaotic environment surrounding the World Trade Center.

8. In or about 2005, Gary was clearly becoming seriously ill. He would come home from work with a debilitating cough, at times coughing up blood. He was ultimately diagnosed with bronchitis. In 2007, following a chest x-ray, Gary was referred to nephrologist, who believed Gary might have kidney cancer. He referred him to an oncologist who confirmed that he had Stage IV kidney cancer that had metastasized, which was rare for someone that young. Gary was approximately 44 years old at the time and became increasingly worried that he would not have many more years to live.

9. As if the pain he endured from his cancer treatments wasn't bad enough, seeing me have to work even harder to take care of him had a severe emotional impact on the rest of Gary's life. We had gone from a happy and affectionate couple, enjoying time with family and friends, to spending every day in the hospital. After his cancer diagnosis, I spent the next two years in hospital rooms learning how to take care of him. The once healthy person I knew and loved continued to lose weight and weighed only around 80 pounds at the time of his death. Gary went from somebody who used to work out regularly to somebody who looked like he was 90-years old. People couldn't even recognize him. As his illness progressed, he could no longer take care of himself, and every visit I had with him at the hospital I felt as though I was just watching him deteriorate.

10. Since Gary had to stop work shortly after his diagnosis and chemotherapy, his illness and death had a huge financial impact on us as well. We could not afford to keep our house in Florida and went from being comfortable to having nothing.

11. Gary felt a tremendous loss since he was no longer able to do the things he enjoyed most and worried constantly about how I would be cared for in the future. The loss of my husband destroyed my life, and nothing will ever replace him or the love that I had for him.

While Gary didn't die on 9/11, his loss is as important as the others who were killed on that day, because if it wasn't for the cancer he would still be here today.

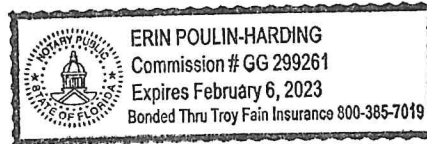
Margaret Mausberg-Bouton
MARGARET MAUSBERG-BOUTON

Sworn to before me this
15th day of April, 2022

Erin Poulin-Harding
Notary Public

STATE OF FLORIDA
COUNTY OF ST. JOHNS

Produced NY DL SSS 018 557



Estate of Stephen M. McCoy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
GAIL T. McCOY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

GAIL T. McCOY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 14 Border Lane, Levittown, New York 11756.
2. I am currently 71 years old, having been born on July 5, 1950.
3. I am the wife of Stephen M. McCoy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. Stephen passed away from bile duct cancer on January 25, 2019. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On April 22, 2019, I was issued Letters Testamentary on behalf of my husband's estate from the Nassau County, New York Surrogate's Court.

6. Stephen was a wonderful husband and family man. Stephen was very patriotic and committed to public service. He loved spending time with his family, especially our grandchildren. Stephen went to all of our grandchildren's sporting events. He enjoyed being outdoors and loved to drive cars. He took me on many road trips. Stephen was very energetic and healthy before he was diagnosed with cancer. Stephen and I bought a house in Pennsylvania where we planned on spending our retirement together.

7. Stephen was at work on the day of the September 11th, 2001 attacks. He was a Court Officer at the Criminal Court in Manhattan. After Stephen witnessed the World Trade Center fall to the ground, he went to Ground Zero where he started helping with the rescue efforts. When Stephen returned home, he was covered in dust and exhausted from moving debris all day.

8. After the attacks, Stephen felt compelled to continue helping with the rescue mission. Stephen was a part of the bucket brigade. For around six months, Stephen went to Ground Zero after work to haul debris. He would not return home until late at night. Stephen hardly ever talked about what he experienced while he was at Ground Zero. The only thing Stephen told me was that the face mask he was given was made of paper-like material. He was worried that the mask did not adequately protect him from the dust and toxins in the air.

9. In 2016, Stephen was diagnosed with bile duct cancer. His eyes had yellowed. We later found out he had jaundice. Stephen was coughing a lot. When Stephen found out about his cancer, he became depressed and developed anxiety. Stephen had insomnia. In June 2016 Stephen underwent surgery. He started feeling a little better afterwards.

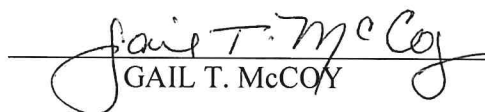
10. In March 2018, Stephen's cancer recurred. He underwent chemotherapy which made him feel very nauseous and gave him sores on his feet. Stephen lost weight and endured a

lot of physical pain. He became easily fatigued. Stephen had to go the hospital almost every week because he was constantly getting fevers and infections.

11. Stephen's next surgery was cancelled after his surgeon found out that Stephen's cancer had spread throughout his entire body. Stephen was determined to overcome his cancer and wanted to undergo another round of chemotherapy. Unfortunately, there was nothing else the doctors could do to save Stephen's life.

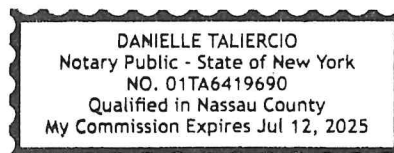
12. Stephen went into hospice care at home after we found out that his cancer was terminal. I had to hire a full-time caretaker because I could not take care of Stephen by myself. Stephen stopped eating and drinking water toward the end of his life. He was in a lot of pain and could not move on his own. Stephen was bedridden and had to be transported by wheelchair. He developed bedsores. Stephen frequently fell out of his bed and wheelchair. I could not pick him up without someone else's help. Stephen had no quality of life when he went into hospice care.

13. It was very painful and traumatic for me and my family members to see Stephen's health deteriorate so quickly. I know Stephen was looking forward to seeing our grandchildren grow up. He was so involved in their lives. Stephen's death was a tragedy for me and my entire family. We all miss him dearly.


GAIL T. McCOY

Sworn to before me this
25th day of May, 2022


Notary Public



Estate of John Patrick McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

Plaintiffs,

**AFFIDAVIT OF
SANDRA MCKEE**

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF DUTCHESS)

SANDRA MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at and reside at 70 Pye Lane, Wappingers Falls, New York 12590.

2. I am currently 57 years old, having been born on November 28, 1964.

3. I am the wife of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my claim on behalf of my husband's estate.

4. On September 12, 2015, my husband passed away from brain cancer, at the age of 48. It was determined by the World Trade Center Health Program that this illness was causally connected to this exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 29, 2016, I was appointed personal representative of my husband's estate by the Surrogate's Court of the State of New York, Nassau County.

6. When I met John in late December 2010, he was a single father who had custody of his children. We both lived in Lynbrook, Long Island. Our relationship progressed quickly. After about three months, I met John's children. He was a loving, devoted father. He planned many activities with his kids, and once I was in the picture, I was always included. Life was

never boring. We went on camping trips together, would go to the movies, and sometimes go ice-skating. John enjoyed spending weekends in Manhattan, just the two of us, walking in the park or visiting museums. We spent truly quality time together. On weekdays, we would mostly stay home, and I would cook dinner for us and the kids. We had a nice little family.

7. John and I met almost a decade after the World Trade Center attacks. He took me down to lower Manhattan to show me where the building he was working in on that day once stood. John was the director of public safety, otherwise known as a Peace Officer, for the City University of New York (CUNY). He was working for the Borough of Manhattan Community College (BMCC) on 9/11, in a building that was adjacent to the World Trade Center. The building later collapsed soon after 9/11. It was John's job to manage the university's response to the attacks. He stayed in the area working out of another BMCC building there for three days.

8. John and I got engaged on my birthday in November 2012. Less than a month after our engagement, everything changed. John and I were attending his daughter's school Christmas recital. He went to get me a cup of coffee, and, on his way back, he suddenly dropped it. He said he couldn't move his hand and his speech was slurred. I immediately rushed him to the emergency room. At first, they suspected a stroke, but an MRI scan revealed that he had a golf-ball sized tumor in his brain. He was diagnosed with Stage IV brain cancer, specifically, a glioblastoma multiforme.

8. John underwent a craniotomy on January 7, 2013. Immediately after the surgery, John was feeling better. The use of his arm returned, and his speech was back to normal. He was in such good spirits, so much so that on the way home from the hospital, he treated himself to hot dogs and a beer.

9. He started radiation treatment shortly thereafter. Each treatment left John in a zombie-like state for several days. He became very frustrated. He could not remember simple things, like what he had done the day before. He would get confused. He was always a gentle, kind man. He didn't yell or curse. The cancer and the treatment took that man away. One night, he suddenly started screaming at me that I had betrayed him. He thought I was his ex-wife. He was enraged. Just as suddenly, John realized who I was. He fell to the floor and cried. The forgetfulness, confusion and bursts of anger continued until he died.

10. The one thing that kept John going was the hope of getting back to work. He loved his job. John's right arm was useless. The muscles had atrophied and caused him a great

deal of pain. The emotional toll it took on him was far worse than any physical discomfort. John's right arm was his dominant arm. He referred to it as his "shooting arm." It never occurred to him that he wouldn't return to police work. He would exercise his hand obsessively, to prepare for his firearms requalification exams. The arm never got better. Eventually, John's body was shutting down, and he couldn't stand or walk. He was confined to a wheelchair, which he resented. About a year after his diagnosis, CUNY officers came to the house and took his gun. That's when he realized he was never going back to work. He was truly devastated.

11. After that, John went into a deep depression. He stopped treatment and refused to consider further treatment options. He didn't want to live. He told me to leave all his pills, including bottles of morphine, by his bedside and to then leave him alone. After a while, John stopped getting out of bed. He slept for days on end. He stopped eating. He was giving up. The day before he died, he seemed to rally. He ate. He tried to play with my granddaughter. He wanted everyone close by. Maybe it was his way of saying goodbye.


SANDRA MCKEE

Sworn to before me this
20 day of April, 2022


Notary Public

